

U.S. District Court

001 27 2005

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

Attorney for Defendant Dong Guk

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased)) CIVIL ACTION NO. 05-0031
By SUNG YOUNG LEE, Personal)
Representative)
Plaintiff)
) DEFENDANT'S RULE 26
v.) DISCOVERY DISCLOSURES
DONG GUK CORPORATION)
)
Defendant) Date Oct. 28, 2005
) time: 8:30 a.m.

Comes now defendant Dong Guk Corporation ("DGC") which submits the following pre-discovery disclosure:

A. PERSONS WITH DISCOVERABLE INFORMATION:

The persons known to DGC who possess discoverable knowledge include, but are not limited, to the following:

1. Gyu Jin Kim

2. Lee Jung Soon
3. Park Jin Joo
4. Lee, Sung Chun
5. Lee, Mi Yeon
6. Moon, Young Soo
7. Oh, Ok Soon

B. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS:

The documents possessed by DGC relevant to his defenses in this lawsuit are as follows:

1. DCG's ABC license
2. The business receipts for the evening of August 1, 2004 and early morning of August 2, 2004.

Other documents not possessed by DGC which are believed to be relevant to the lawsuit include but are not limited to the following:

1. The police investigation report of the traffic accident on or about August 2, 2004. This document is believed to be in the possession of the Commonwealth Department of Public Safety
2. The traffic case and /or criminal case , if any, against Gyu Jin Kim.

Documentation regarding this matter will possessed by the Superior Court

of the Northern Mariana Islands.

3. The medical records, if any, reflecting the treatment received by Gyu Jin Kim following the traffic accident. Such documentation, if it exists, should be in the possession of the Commonwealth Health Center.
3. The autopsy of Jung Soon Lee, if any. This document, if it exists, should be in the possession of the Commonwealth Health Center.
4. The judicial proceedings in which Sung Young Lee was appointed the personal representative of Jung Soon Lee. This documentation, if it exists, should be in the possession of the Superior Court of the Northern Mariana Islands.

C. EXPERT WITNESSES:

DGC has not made a determination as to whether it will use an expert witness in this case.

D COMPUTATION OF DAMAGES:

DGC does not have a claim for damages.

E. INSURANCE

DCG possesses business liability insurance issued by Dongbu Insurance Co. Ltd.

Dated this 27th day of October, 2005.

Law Office of G. Anthony Long

By. 

G. Anthony Long

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